



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

the confulfillment. This obligation to respond in damages, having been merely incidental to the others, became the sole obligation left of the contract, and being susceptible of fulfillment by another, as well as by the obligor, was enforceable against the heirs of the latter. The liability therefor was fixed, and, the damages demanded being recognized by the law of Louisiana as actual and compensatory, there was no reason why they should not be recovered in the same manner as damages to person and property.

Union Labels on Ballots.—The Supreme Court of New York In re Peters, 112 New York Supplement, 339, discussed the effect of printing "Union Labels" on ballots. The board of inspectors refused to count certain ballots, and returned them to the custodian of the primary records, because they bore the imprint of the label. The proceeding sought a review of such action. The Primary Election Law (Laws 1898, p. 343, c. 179, § 6) prescribing the form of ballots provides that those not conforming thereto shall not be counted. The court holds that the ballots were not void, as the mere addition of the Union Label did not defeat any of the salutary provisions of the election law, but concludes that the statute might be properly amended to prohibit the use of any emblem whatever.

Stenographer Is a Laborer.—The case of *Cohen v. Aldrich*, 62 Southwestern Reporter, 1015, arose from the garnishment of \$35 of the salary of a stenographer by a person named Cohen. The defendant claimed an exemption, asserting that his employment was laborer. The Court of Appeals of Georgia held that even though proficiency in stenography was the reward of steady practice and experience, the stenographer exercises no discretion. If his employer indulges in the pastime of murdering the king's English, he must become a "particeps criminis," and join in the assassination. No one who has gone through that backbreaking ordeal will hesitate to range it in the category of hard physical labor. A stenographer is entitled to a laborer's wage exemption.

Justifiable Homicide.—A negro woman went to the police station and complained that defendant, another negro, had cursed her. Without having secured a warrant, an officer went on the following day to defendant's residence and announced to him his intention to arrest him. To this defendant objected. Seizing a shotgun he escaped, and addressed himself diligently to flight. An officer shot at him several times, wounding him twice. The crowd yelled, "Get him!" "Shoot him!" A citizen joined in the chase so zealously that he outstripped the officers. Defendant wheeled, shot and killed the pursuing citizen. In *Holmes v. State*, 62 Southeastern Reporter, 716,